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REMARKS

Claims 1-27 are currently pending in the subject application and are presently under consideration. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein.

**I. Rejection of Claims 1-3, 5-7, 14 and 21-23 Under 35 U.S.C. §103(a)**

Claims 1-3, 5-7, 14 and 21-23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tjandrasuwita, *et al.* (US patent 5,422,654) in view of Santilli (US patent 5,675,361). Reconsideration and allowance of these claims is respectfully requested for at least the following reasons. Neither Tjandrasuwita, *et al.* nor Santilli, alone or in combination, teach or suggest all the limitations recited in the subject claims. Further, there is no motivation found within the cited references to combine such references.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

In particular, neither Tjandrasuwita, *et al.* nor Santilli teach or suggest *a hardware cursor that selectively overlays a cursor image across a display boundary onto... first and second display portions... of a dual scan display* as recited in independent claims 1, 5, and 21. The Examiner cites Tjandrasuwita, *et al.* as disclosing a dual scan display, but concedes that the aforementioned reference does not disclose, teach, or suggest *a hardware cursor* as

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claimed. To make up for this deficiency, the Examiner cites Santilli as "having a hardware cursor (19) adapted to selectively overlay a cursor image and an inherent across the display boundary onto at least one of the first and second display..." The Examiner's contention that Santilli discloses *a hardware cursor* (which is a term of art), however, is incorrect.

Hardware cursors are conventionally employed in single scan displays to reduce processing overhead associated with software cursors. In typical cursor display systems (both hardware cursor display systems and software cursor display systems), information to be displayed is stored in a video memory that is read by a display controller, which generates display images based on contents of video memory. The video memory is structured such that a physical location of a display corresponds to a specific portion of video memory. Referring particularly to software cursor implementations, a cursor must be "redrawn" in video memory each time it translates to a disparate location, and display information previously covered by the cursor must be refreshed. Such repeated redrawing often requires a great deal of processing power, and therefore adversely affects performance.

In hardware cursor display systems, information describing a single cursor representation is stored in a predetermined location of video memory, and information that describes a screen image (without the cursor representation) is stored elsewhere in video memory. Information from the cursor portion of video memory can then be combined with the information describing the screen image to produce a final display image. In such hardware cursor display systems, when a cursor position is altered, cursor placement does not affect non-cursor information in memory, and position of a cursor in relation to a screen image can be stored in a register. As a display controller scans video memory it compares a value in the register corresponding to cursor position with its current location in video memory. When the display controller reaches the location of the cursor in memory, it reads the information in the cursor portion of video memory rather than the information that describes the screen image at that point. Thus, utilizing hardware cursor systems, display information need not be constantly refreshed (thereby reducing processing overhead). While hardware cursor display systems have been successfully implemented in single-scan displays, employing such systems in dual-scan displays has historically been problematic due to issues relating to dual bit streams utilized in dual-scan displays (one for each portion of a dual-scan display). The subject invention as recited in the aforementioned claims *overlays a hardware*

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*cursor across a display boundary between first and second display portions... of a dual scan display*, thus overcoming many deficiencies associated with conventional cursor display systems/methodologies.

In contrast to the subject invention as claimed, Santilli nowhere discloses, teaches, or suggests that the illustrated cursor is a *hardware cursor* as described above, much less disclose, teach, or suggest *a hardware cursor... selectively overlaid across a display boundary onto first and second display portions... of a dual scan display* as recited in the aforementioned independent claims. In contrast, Santilli never utilizes the term "hardware cursor" or similar language to describe the cursor relied upon by the Examiner (See Fig. 1, Numeral 19). Furthermore, Santilli teaches that a cursor can be controlled on disparate portions of a screen *via* utilizing different keys, and that the cursor is positioned and displayed with aid of software. (See col. 10, lines 53-67).

As the teaching or suggestion to make the claimed combination must both be found in the cited references under *In re Vaack*, 947 F.2d 488 (Fed. Circuit, 1991), and neither Tjandrasuwita, *et al.* nor Santilli teach or suggest *concurrently overlaying a cursor image generated via a hardware cursor onto first and second display portions*, it is readily apparent that the rejection of claims 1, 5, and 21 (and claims 2-3, 6-7, 14 and 22-23 which depend therefrom) should be withdrawn.

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CONCLUSION

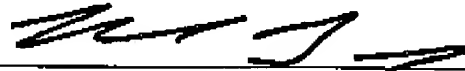
The present application is believed to be in condition for allowance in view of the above comments. A prompt action to such end is earnestly solicited.

In the event any additional fees are due in connection with this document beyond those covered by the attached credit card payment form, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number below.

Respectfully submitted,

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